

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DEBORAH THELEN, individually	)	
and on behalf of all others similarly	)	
situated,	)	
	)	C.A. No. 22-208-CFC
Plaintiff,	)	
	)	
v.	)	
	)	
HP Inc.	)	
	)	
Defendant.	)	

**STIPULATION AND [PROPOSED] ORDER REGARDING  
THE FILING OF AN AMENDED COMPLAINT  
AND DEFENDANT’S RESPONSE THERETO**

WHEREAS, Plaintiff Deborah Thelen (“Plaintiff”), a resident of New York, filed the Complaint in this action on February 16, 2022 (*see* D.I. 1);

WHEREAS, Defendant HP Inc. (“HP”) agreed to waive service of the Summons and Complaint under Rule 4 of the Federal Rules of Civil Procedure, and Plaintiff filed the Waiver of Service of Summons on March 8, 2022 (*see* D.I. 3);

WHEREAS, HP’s current deadline to respond to the Complaint is May 6, 2022 (*see* D.I. 3);

WHEREAS, Plaintiff intends to amend her Complaint to add additional plaintiffs residing in states other than New York, and asserting one or more additional claims against HP arising under the laws of those states;

WHEREAS, in light of Plaintiff's intention to amend her Complaint, the parties have agreed to stipulate to set a deadline for that amendment, and to set the deadline for HP's response thereto; and

WHEREAS, the parties agree that nothing in this stipulation shall affect Plaintiff's right to amend her Complaint once as a matter of course pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), or to seek further leave to amend the Complaint under Federal Rule of Civil Procedure 15(a)(2). For avoidance of doubt, the parties agree that the Plaintiff and any newly added plaintiffs shall retain the right to amend the Complaint as of right once after HP files its anticipated motion to dismiss.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, subject to the approval of the Court, as follows:

1. Plaintiff shall file her First Amended Complaint, adding additional party plaintiff(s) asserting claims against HP, by no later than May 23, 2022;

2. HP's deadline to respond to Plaintiff's First Amended Complaint shall be June 23, 2022.

/s/ P. Bradford deLeeuw

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*Attorneys for Defendant HP Inc.*

Dated: April 25, 2022

SO ORDERED, this \_\_\_\_ day of April, 2022.

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The Honorable Colm F. Connolly  
Chief United States District Judge